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July 30, 2020

Via ECF

Magistrate Cathy L. Waldor  
Martin Luther King Jr. Courthouse  
50 Walnut Street  
Room 4040, Courtroom 4C  
Newark, New Jersey 07101

Re: *Gelis, et al. v. BMW of North America, LLC.*,  
Civil Action No 2:17-cv-7386 WHW-CLW

Dear Judge Waldor:

This firm, together with Nagel Rice LLP and Thomas Sobran, P.C. represents plaintiffs in the above-referenced action. We are writing, with the consent of Christopher Dalton on behalf of BMW NA, to request one additional two-week adjournment of the return date for Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement, currently scheduled by the Court for August 3, 2020. The new proposed return date would be August 17, 2020.

We apologize for the delay but counsel have been continuing to diligently attempt to nail down the final issues and believe that the parties are nearing completion of a final Settlement Agreement that can be executed. Until the final requested revisions are approved, we are unable to file a motion with a fully executed Settlement Agreement annexed by the current deadline. We are hopeful that the additional two weeks will be sufficient.

The parties respectfully request that the Court "So Order" this adjournment request.

Magistrate Cathy L. Waldor

July 30, 2020

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Respectfully yours,



GARY S. GRAIFMAN

GSG:mm

cc: All Counsel of Record

SO ORDERED:

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HON. CATHY L. WALDOR, U.S.M.J